## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MISSOURI EASTERN DIVISION

In re:	
JACQULYN Q DAVIS,	Case No. 16-46387
	Chapter 13
Debtor.	

## RESPONSE TO TRUSTEE'S MOTION TO DISMISS

COMES NOW Jacqulyn Q Davis, Debtor herein, and for its Response to Trustee's Motion, states to the Court as follows:

- 1. Debtor filed this bankruptcy proceeding on September 2, 2016.
- 2. Trustee filed a Motion to Dismiss for failure to make plan payments on January 26, 2017.
  - 3. Debtor will bring the plan payments current in the immediate future.
  - 4. Trustee's Motion should therefore be denied.

WHEREFORE, Debtor prays for an order denying Trustee's Motion, and for such other and further relief as the Court shall deem just and proper.

By: /s/Jonathan Brent JONATHAN E. BRENT #59169MO Attorney for Debtor 462 N Taylor, Ste 105 St. Louis, MO 63108 (314) 200-5346 (314) 735-4046 (Fax)

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## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of Debtor's Response was sent through the Court's ECF System or by ordinary mail, on the 28th day of January, 2017 to the following:

Chapter 13 Trustee: John V. LaBarge, Jr. Chapter 13 Trustee P.O. Box 430908 Saint Louis, MO 63143

Office of the US Trustee: Thomas Eagleton US Courthouse 111 S. 10th Street, Suite 6353 St. Louis, MO 63102

/s/ Jonathan Brent